

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

JOSE SANCHEZ RAMOS	)	
Plaintiff,	)	
	)	
vs	)	
	)	
	)	Civil Action No. 1:17-CV-00924 LMB/TCB
BAWADI, INC	)	
d/b/a Bawadi Mediterranean Grill and	)	
Sweets Cafe, AND	)	
KHALID MEKKI	)	
	)	
Defendants.	)	

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DEFENDANTS ANSWER TO PLAINTIFF’S COMPLAINT

NOW INTO COURT, through undersigned counsel, come Defendants, Bawadi Inc d/b/a Bawadi Mediterranean Grill and Sweets Cafe and Khalid Mekki who state as follows for their Answer and Affirmative Defenses to Plaintiff’s Complaint:

1. Paragraph 1 is a legal conclusion and does not require an answer.
2. Paragraph 2 is a legal conclusion and does not require an answer.
3. Paragraph 3 is a legal conclusion and does not require an answer
4. Admit
5. Admit
6. Defendant has no knowledge of the allegations in Paragraph 6
7. Admit
8. Admit
9. Admit
10. Admit

11. Admit

12. Admit

13. Admit

14. Admit

15. Admit

16. Admit

17. Admit

18. Defendant has no knowledge of the allegations in Paragraph 18.

19. Deny

20. Deny

21. Deny

22. Deny

23. Deny

24. Admit

25. Deny

26. Deny

27. Deny

28. Deny

29. Deny

30. Deny

31. Deny

32. Deny

33. Deny

34. Admit

35. Deny

36. Deny

37. Deny

38. Deny

39. Deny

40. Deny

41. Deny

42. Deny

43. Allegations in paragraph 43 are a legal conclusion and do not require a response

44. Deny

45. Deny

46. Deny

47. Admit only that under VA law employers are required to pay \$7.25 and time and half  
for overtime pay.

48. Deny

49. Deny

50. Deny

51. Deny

52. Deny

#### FIRST AFFIRMATIVE DEFENSE

If the Defendants violated the Fair Labor Standards Act, they did so in good faith and in the belief that they were not violating the Act.

## SECOND AFFIRMATIVE DEFENSE

Plaintiff was paid for the hours that Defendants believed in good faith that they worked and was based on information provided by the Plaintiff to the Defendants.

WHEREFORE, The Defendants respectfully request that that Court:

1. Dismiss the action brought by the Plaintiff
2. Award reasonable attorneys fees and court costs
3. Award any other relief the Court deems appropriate

Respectfully Submitted,

/s/

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/s/

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## CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2017, a copy of the foregoing ANSWER was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Courts electronic filing system or by mail to any party not able to access the courts electronic filing system. Parties may access this filing through the courts CM/ECF system.

November 16, 2017

Respectfully Submitted,

/s/

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